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7
8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 NICOLE ZURSCHMIEDE,

11 Plaintiff,

12 vs.

13 THE LITTLE CHAPEL, LLC, a Domestic
14 Limited-Liability Company, d/b/a
CHAPEL OF THE FLOWERS, and DOE
15 Defendants I-X,

16 Defendants.

Case No.: 2:19-cv-00106-JCM-VCF

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANT TO FILE A
RESPONSIVE PLEADING TO PLAINTIFF'S
COMPLAINT**

(Second Request)

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18 Defendant The Chapel, LLC doing business as Chapel of The Flowers ("Defendant"),
19 (erroneously sued as "The Little Chapel, LLC), by and through its counsel, Jackson Lewis P.C.,
20 and Plaintiff Nicole Zurschmiede ("Plaintiff") by and through her counsel, HKM Employment
21 Attorneys LLP, hereby stipulate and agree to a second extension of the time for Defendant to file
22 a responsive pleading to Plaintiff's Complaint.

23 Plaintiff served her Complaint on May 10, 2019, and Defendant's response was due on
24 May 31, 2019. On May 30, 2019, pursuant to stipulation of the parties, the Court granted
25 Defendant a 30-day extension up to including June 30, 2019, to file its responsive pleading to
26 Plaintiff's Complaint. (ECF No. 10). During the past 30 days, Defendant investigated the
27 allegations in Plaintiff's complaint, and the Parties began settlement discussions. The Parties are
28 actively engaged in settlement discussions and wish to avoid the potentially unnecessary time and

1 expense of Defendant's response to the Complaint, the Parties completion of the FRCP 26(f)
2 Conference, and the Parties exchanging initial disclosures.

3 Accordingly, the Parties have stipulated to a second extension of the deadline for
4 Defendant to file a response to the Complaint. The Parties have agreed to a 22-day extension to
5 allow the Parties enough time to conclude their early settlement discussions. The 22-day
6 extension takes into account anticipated delays during the Fourth of July holiday week, and
7 avoiding a deadline that falls on a Sunday.

8 Defendant shall, therefore, have a twenty-two (22) day extension up to and including
9 Monday, July 22, 2019, to file a responsive pleading to Plaintiff's Complaint.

10 This stipulation and order is sought in good faith and not for the purpose of delay. One
11 prior request for an extension of time has been made for a 30-day period.

12 Dated this 27th day of June, 2019.

13
14 /s/ Deverie J. Christensen
15 Deverie J. Christensen, Bar No. 6596
16 300 S. Fourth Street, Suite 900
17 Las Vegas, Nevada 89101


18 *Attorneys for Defendant*
19 *The Chapel, LLC*

/s/ Jenny L. Foley
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Attorneys for Plaintiff
Nicole Zurschmiede

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21
22 **IT IS SO ORDERED.**

23 Dated this 28th day of June, 2019.

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27 _____
28 United States Magistrate Judge